

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

**In re:**

**City of Detroit, Michigan**

**Debtor**

**Bankruptcy Case No: 13-53846  
Honorable Thomas J. Tucker  
Chapter 9**

**MEMORANDUM IN SUPPORT OF MOTION FOR  
LEAVE TO FILE DELAYED PROOF OF CLAIM**

**Movant Has Met the Standard for Obtaining Leave to File an Amended Proof of Claim  
under *Bankruptcy Rule 3003(C) (3)***

Pursuant to *Federal Rule of Bankruptcy Procedure 3003 (C) (3)*, a Proof of Claim (hereinafter sometimes POC) may be amended, provided leave is granted by the Court. The Proof of Claim filed herein by DPOA on Collins' behalf needs to be amended in order to bring before a Court of competent jurisdiction all legal theories sharing the same or related factual predicate as the claim filed by DPOA. Also, Collins needs to file an amended POC because DPOA recently informed him that it would no longer pursue on his behalf a grievance of his termination for the alleged payroll fraud or larceny that a Wayne County jury acquitted him of on December 8, 2011. *See, Exhibit 1*

The proposed delayed Proof of Claim maintains any claims asserted in the original Proof of Claim, but also purports to assert the full panoply of legal theories or claims, that sharing the same or related factual predicate as Proof of Claim #1877. Accordingly, Collins seeks the Court's leave to file a delayed or amended POC, which should be granted for the reasons set forth below.

## Statement of Facts

Collins was hired by DPD on September 20, 1993, as a law enforcement officer. Before becoming a police officer, Collins had played and coached semi-professional softball, and engaged in other athletic activities. Cognizant of Collins' background in athletics, about 11 years after his hire, DPD officials assigned him to the Ninth Precinct, where he worked in the Community Relations Unit and reported to Commander Vivian Tolbert. Within a few weeks of being assigned to the Ninth Precinct, Commander Tolbert instructed Collins that his primary mission in Community Relations was to develop after school sports programs for youth in the community served by the Ninth Precinct as part of an ongoing crime fighting initiative. His shift was from 2:00 p.m. to 10:00 p.m., five days a week. He also worked Saturdays and Sundays because games were held weekends. His schedule was tailored to facilitate contact with the adolescents DPD wanted to reach. Collins went about his work as assigned, and continued to do the work for which Detroit PAL named him its Officer of the Year in 2000. *See, Exhibit 2*

In early 2006, the Ninth and Fifth Precincts merged to form the Eastern District. Collins then became supervised by Sergeant Mattie Lewis, who headed the Community Relations Unit of the Eastern District. Sgt. Lewis ordered Collins to continue in his specialized duties on the same shift, but for reasons best known to herself, recorded his tour of duty as being from 12:00 a.m. to 8:00 p.m. The discrepancy later played a significant role in Collins' misfortune because it seemed to suggest he should have been on duty when he was not. Collins did such a good job that he won the Spirit of Detroit Award from the City of Detroit and Certificate of Appreciation from the Wayne County Board of Commissioners. *See, Exhibits 3 & 4*

In furtherance of his mission to advance the goals of the Community Relations Unit, Collins organized youths from the east side into competitive football, bowling, baseball, and

basketball teams; he organized regular after school practices involving teams from Detroit and neighboring communities. Significantly, Collins work was not supported financially by DPD. But because Collins was so dedicated to his mission, and saw firsthand the beneficial impact of his work on the young people he served, Collins funded his work out of his own pocket. The fruit of his efforts is reflected in the young men whom he coached, or played in the league he organized, who are now attending some of the most prestigious universities in the country on athletic scholarships, or pursuing careers as professional athletes. For example: Derrick Walton plays basketball for the University of Michigan; DPD Sgt. Lem Wilson brought his son, Richard, to practice; Richard Wilson is the starting running back at Boston College; Michael Webber, running back at Ohio State; Kiree Phillip (Oakland University) now plays for Cleveland Cavaliers, and Al Robertson, (Penn State) and now plays for the Jacksonville, Jaguars). Robert Edwards at Cleveland State, Josh Jackson at Kansas University; Quintin Jackson, a player on Huntington Woods Bulldogs, was the son of Rodney Jackson, DPD IA; ; Dominick Barnes – Youngstown State, Detroit Lions; Juwan Howard, Jr (U of D) overseas; Carlton and Dale Brundage, U of M, transferred to U of D; Devin Marvel, Iowa University; Amir Williams, Ohio State (Orlando Magic); Josh Lowles, Kent State University (Greek Pro League); Dion Sims, Michigan State University (Miami Dolphins); Jacob Joubert, U of D; Edmond Summers, Xavier University (Cincinnati); Ernest Thomas, University of Illinois; Andre` Rison, Jr, MSU, Joe Dumars, Sr attended games (FAMU), Joe Dumars, Jr; Benny Flowers, Jr , MSU (Denver Broncos); Daryl Fleming, GVSU; Chris Flowers, CMU (Indiana Pacers); Deitech Lever, Ferris State (son of IA Officer Lever); A.J. Matthews, U of Toledo; Billy Thomas, Oakland; Al Irendow, DePaul; Carl Baker, Schoolcraft College; Dave Lamone – Cornell University; Jeff O'Brien, GVSU; Braylon Edwards, U of M (Cleveland Browns); Devin Gardner, U of M; Isaac

Spikes, Central Florida University; Jordan Morgan, U of M; Shane Williams, Morehead State University; Durell Summers, MSU; Mike Sinclair, Miles College; Marcus Crenshaw, Cal State Fullerton; Delano Collins, Albion University; Marcus Jones, USC (basketball); Lee Bailey, Chaminade (Hawaii); Desmond Barnes, Arizona State University; Cassius Winston, who plays basketball for Michigan State is an alum of his programs. Over 100 kids that came through his program went on to play at the college level. The success his alums have had is a clear testament to the fundamental strength of his work and commitment.

Upon his arrival at work on scheduled workdays, Collins checked in with Sgt. Lewis, who posted his weekly and weekend schedules in the Eastern District's Community Relations office, and circulated a copy of his schedule to then Deputy Chief Godbee and the District's two Commanders, i.e., James Moore and Steven Dolunt.<sup>1</sup> *A copy of his schedules are attached as Exhibits 5 and 6. Also attached are photographs of Collins on sideline of football games as Exhibit 7.* Collins performed his duties in an exemplary manner<sup>2</sup> with the full knowledge and support of his superiors until the fall of 2008, when a letter from his estranged wife accusing him of time and attendance irregularities came into the District. Unbeknownst to Collins, the letter from his estranged wife went to Internal Affairs, where it triggered a covert investigation that went nowhere.<sup>3</sup> An anonymous letter to DPD a year later raised similar allegations. The Internal Affairs investigation it triggered found that Collins had committed larceny by false pretenses for an amount in excess of a hundred dollars by being paid for hours not worked. As subsequent

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<sup>1</sup> In order for Collins to leave the City with DPD van for practice, or road trips, e.g., to Flint, Collins always obtained approval. Unauthorized use of vans was ground for dismissal.

<sup>2</sup> Collins was recognized for his good work by the Detroit City Council and Wayne County Commission. *See, e.g., Exhibits 3 and 4*

<sup>3</sup> Even though he was under investigation by Internal Affairs in 2007 because of a letter from his estranged wife, DPD never informed Collins that he was being investigated.

events, including a jury trial, conclusively demonstrated, the IA investigation was nothing more than a spiteful, witch hunt or vendetta against a good man, who had done nothing wrong.

DPD's theory was that Collins was being paid for work he had not performed because the shift he actually worked did not jibe with the time sheet Sgt. Lewis prepared.<sup>4</sup> Although Collins' with entire DPD chain of command, starting with Sgt. Lewis, knew Collins' actual shift (because it was prepared by his superiors and posted in the precinct, with a copy circulated to headquarters), Internal Affairs sought and obtained a warrant charging Collins with three felonies. Despite ample proof that Collins had done nothing wrong,<sup>5</sup> and had performed his duties in a transparent and noteworthy manner, *See, Exhibits 2, 3 and 4*, he was still subjected to the wrenching emotional duress of a jury trial with exposure to a possible jail term.<sup>6</sup> Fortunately for Collins, he was able to obtain competent representation (for which he remains deeply in debt), and demonstrate to the jury that the charges against him were totally devoid of merit. He was acquitted of all charges on December 8, 2011. *See, Exhibit 8* He requested reinstatement a few days later, but was denied. *See, Exhibits 9 & 10*

**None of the factors that may militate against granting leave to amend the Proof of Claim is present herein.**

Collins has acted with reasonable promptness to seek clarification from the Court. He has requested a ruling as to the procedural avenues available to vindicate or raise his very serious claims of official misconduct, abuse of power, gender based discrimination where two direct female comparators were treated much better than he was for similar allegations of misconduct, and violations of constitutional rights that his POC preserved, or would have preserved had it

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<sup>4</sup> The pictures attached as *Exhibit 7* show Collins at a PAL football game with his superiors, Chief Godbee and State AAU officials,

<sup>5</sup> Brian McKinney coached in Collins' program for 3 years, and work in Special Ops

<sup>6</sup> Renee Hall (now Deputy Chief) who had worked with Collins in Community Relations and knew firsthand his scheduled and range of activities, worked in IA on Collins' case, helped to administer his Garrity (??).

been properly drafted in light of the mistreatment, and egregious violation of Collins' rights under the *U.S. Constitution*, 42 USC § 1983, Art 1, § 17 of the *State of Michigan Constitution*, (which guaranteed Collins the right to fair and just treatment during investigations), *Michigan Common and Statutory law* that occurred both before and after the City filed its petition.

Upon his acquittal on December 8, 2011, the DPOA wrote Chief Godbee requesting Collins' reinstatement. *See, Exhibit 5 Verified Motion*. Although Chief Godbee never replied in writing to DPOA's demand, it appears that he issued a verbal denial. On December 26, 2011, DPOA, made a second request for Collins' reinstatement in which it explained that Collins' certification as a police officer was about to expire. *See, Exhibit 6, Verified Motion*. DPD knew that, even if it did not wish to bring Collins back, it could have reinstated him for one day which would have renewed his certification, and enabled him to find work elsewhere as a police officer. Again, Chief Godbee never replied.<sup>7</sup> Instead, DPD served notice on Collins (who had been suspended without pay since January 20, 2010) that it proposed to terminate him. His union filed a reinstatement back pay, grievance (#10-005) as to the proposed termination, 12-0137. *See Exhibit 1* Procedurally, DPD fast tracked Collins proposed termination, and conducted the actual removal proceedings just about as quickly as any DPD had ever conducted. Before dumping him on September 29, 2016, Collins' union continued to represent him and defended him through the arbitration hearing conducted after the City had filed its Chapter 9 petition. Although the City knew, or should have known, it was impermissible to proceed with the arbitration, it did so anyway with Ms. Ashford serving as Arbitrator. The hearing concluded in 2013; however, the

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<sup>7</sup> On October 8, 2012, Chief Godbee resigned amid allegations that he engaged in sexual relations with a subordinate female police officer in the Internal Affairs Unit.

arbitrator apparently feeling constrained by the bankruptcy filing, declined to issue a ruling.<sup>8</sup> In February 17, 2014, Ashford upheld the termination.

### **Summary and Conclusion**

Collins moved as quickly as he could to seek leave to file a Delayed Proof of Claim. No new facts are alleged. Rather, settled facts are placed into context as alleging violations of rights arising under the *14<sup>th</sup> Amendment to the U.S. Constitution*, 42 U.S.C. § 1983, Art 1, § 17 of the *State of Michigan's Constitution* and its statutory and common law. The relief Collins seeks is within the Court's authority, and benefits from a policy that leave should be granted unless equitable considerations to the contrary are present. Since none such are present herein, Movant requests leave be granted.

BENJAMIN WHITFIELD, JR & ASSOCIATES, P.C.

/s/ Benjamin Whitfield, Jr.

Benjamin Whitfield, Jr. (P23562)  
613 Abbott Street  
Detroit, Michigan 48226  
(313) 961-1000  
[benwlaw4822@aol.com](mailto:benwlaw4822@aol.com)

Dated: November 30, 2016

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<sup>8</sup>According to Collins, the file is stored in her garage.

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**LIST OF EXHIBITS FOR MEMORANDUM IN SUPPORT  
OF MOTION FOR LEAVE TO FILE DELAYED PROOF OF CLAIM**

1. Copy of letter dated September 26, 2016 from Linda Broaden, DPOA Shop Steward, to Collins
2. PAL Award to Jerome Collins as 2000 Officer of the Year
3. Spirit of Detroit Award made to Jerome Collins for meritorious work with youth
4. Certificate of Appreciation from Wayne County Board of Commissioners, dated February 4, 2009
5. Copy of Collins' schedule for time frame, 2008 and 2009
6. Copies of photographs of Collins on duty at sponsored football games. Also depicted are AAU officials and Chief Godbee
7. News article, dated December 14, 2011, reporting that Collins had been found not guilty after a jury trial.
8. Copy of inter-office memo, Eastern District, dated November 29, 2010 re: inter alia, youth initiative commentary regarding basketball team and football team for 13 and under



# **EXHIBIT 1**



# DETROIT POLICE OFFICERS ASSOCIATION

INCORPORATED

1938 E. JEFFERSON  
DETROIT, MICHIGAN 48207

Phone (313) 567-8770

Fax (313) 567-7875

September 29, 2016

## OFFICERS

MARK DIAZ  
President

RONALD B. THOMAS  
Vice President

DONNA LATOUF  
Secretary-Treasurer

LINDA BRODEN  
Sergeant-at-Arms

Jerome Collins  
P.O. Box 21454C  
Auburn Hills, MI. 48231

REGARDING GRIEVANCE: # 10-005

Dear Mr. Collins:

Per Our conversation, the above reference grievance was scheduled for arbitration on February 9, 2012. The grievant Officer Collins, failed to appear for the arbitration. Officer Collins reason for not appearing was that he was acquitted of the charges and he wish to be reinstated to the payroll. The grievant failed to cooperate.

On February 9, 2012 a letter was sent to the grievant requesting his full cooperation and the grievance would be rescheduled at a later date. On June 12, 2013, the grievance was rescheduled and heard by Umpire Linda Ashford. However, a decision was never rendered due to all arbitrations were suspended and the bankruptcy occurred.

On February 7, 2014, the grievant was dismissed from the department on the disciplinary arbitration grievance # 12-0137, issued by Umpire Linda Ashford. Therefore, the Association closed the above reference grievance # 10-005, based on the Opinion and award of Umpire Linda Ashford.

Sincerely,

DETROIT POLICE AOFFICERS ASSOCIATION

Linda Broden  
Sergeant at Arms

## **EXHIBIT 2**

# Detroit Police Athletic League (PAL) Names Jerome Collins 2000 Officer of the Year

Jan 17, 2000, 00:00 ET from Detroit Police Athletic League (<http://www.prnewswire.com/news/detroit+police+athletic+league>)

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DETROIT, Jan. 17 /PRNewswire/ -- Officer Jerome Collins, a six-year veteran of the Detroit Police Department, has been named the Detroit Police Athletic League (PAL) 2000 J.P. McCarthy - PAL Officer of the Year for his work with Detroit youngsters. He was presented with the award at a reception at the Detroit Opera House following the North American International Auto Show Charity Preview on Friday night. Attending the event were dignitaries such as Detroit Mayor Dennis Archer, Detroit Chief of Police Benny Napoleon and representatives from the PAL Board of Directors.

As Officer of the Year, Officer Collins will serve as a spokesperson for PAL throughout the next year at various functions, meetings and special events. His responsibilities will take on an added importance as this year marks PAL's 30th anniversary of serving the boys and girls of Detroit. Numerous activities and special events are being planned to celebrate the anniversary.

"Officer Collins' impact on the youth of Detroit has been immeasurable," said John MacDonald, president of PAL's Board of Directors and DaimlerChrysler Senior Vice President of Sales and Service. "He provides an excellent example of honesty, integrity and sincerity. He's quickly become a respected leader to the boys and girls of PAL."

Assigned to PAL since 1998, Collins serves as commissioner of the boys basketball and girls softball programs. When Collins first came to PAL, one of his goals was to improve these already successful and established programs. Judging from the 1999 numbers, Collins brought each to an even wider audience and set all-time participation records for each program. In addition to increasing youth participation, he increased the number of volunteer coaches for the basketball program dramatically. Collins also oversees the athletic activities at Plymouth Education Center, the newest site in the PAL Tutorial Program.

In his six years on the force, Collins has had numerous assignments, including the Eighth Precinct, the gang squad, records and statistics, a high-priority crimes task force, narcotics and most recently, community relations. While he's enjoyed all his assignments, it is his work with the children of Detroit that Collins enjoys most.

"I've been lucky in that since joining the force, I've had some great assignments," said Collins. "I enjoy my work at PAL as an administrator and a commissioner very much, but it's the one-on-one with the children that is by far the most rewarding aspect of my job," said Collins. "To be recognized as Officer of the Year for something I love doing is a very humbling honor and I plan to make the most of that distinction and use it to reach even more children."

Officer Collins was selected from among his peers by a committee comprised of PAL commanding Sergeant Allison Walker, representatives from PAL's Board of Directors and members from the staff of Detroit Chief of Police Benny Napoleon. The award, named in honor of the late J.P. McCarthy, the popular WJR Radio personality and a dedicated PAL supporter, was created by former PAL Board President Robert L. Rewey, Group Vice President of Marketing and Sales Operations for Ford Motor Company, one of the Big Three corporate sponsors of PAL.

This year marks the fourth year for the award. Past J.P. McCarthy - PAL Officer of the Year honorees include Officer Robert Mingus in 1999, Officer Simone Bell in 1998 and Officer Pamela Walker in 1997. Given annually to an officer who regularly excels in youth activities, the award is open to all officers from the Detroit Police Department.

Founded in 1970, PAL serves more than 10,000 Detroit youths ages six to 16 through 15 sports programs, two multi-service education and activity centers and tutorial sites at seven Detroit elementary schools.

SOURCE Detroit Police Athletic League

Journalists and Bloggers

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<http://www.prnewswire.com/news-releases/detroit-police-athletic-league-pal-names-jerome-collins-2000-officer-of-the-year-72086362.html>

## **EXHIBIT 3**



# SPIRIT OF DETROIT AWARD

is presented herewith as an expression of the  
gratitude and esteem of the citizens of Detroit  
to

**P.O. Jerome Collins**

In recognition of exceptional achievement,  
outstanding leadership, and dedication to  
improving the quality of life.

By the City Council  
of Detroit, Michigan

*Councilwoman Brenda Jones and the members of the Detroit City Council,  
would like to extend our sincere thanks and gratitude for all of the support you  
provided to the Detroit Police Eastern District Community Relations Unit.*

*Monica Conyers*  
COUNCIL PRESIDENT

*Joanawetam*  
COUNCIL PRESIDENT PRO TEM

*Kwame Kenyatta*  
COUNCIL MEMBER

*Shirley H. Cook*  
COUNCIL MEMBER

*Harold*  
COUNCIL MEMBER

*Barbara Rose Collins*  
COUNCIL MEMBER

*Alberta Indya Isobai*  
COUNCIL MEMBER

*Brenda Jones*  
COUNCIL MEMBER

## **EXHIBIT 4**

# CERTIFICATE OF APPRECIATION

#15 Edward A. Boike, Chair  
 #6 Keith Williams, Vice Chair  
 #5 Iona Varga, Vice Chair Pro Tempore  
 #8 Alisha R. Bell  
 #3 Moe Blackwell  
 #10 Laura Cox  
 #12 Joan Gebhardt  
 #1 Tim Killeen  
 #7 Burton Leland  
 #11 Kevin McNamara  
 #14 Joseph Palamara  
 #2 Bernard Parker  
 #4 Jewel Ware  
 #9 Diane L. Webb  
 #13 Gary Woronchak

## WAYNE COUNTY COMMISSION

*We commend and salute*  
**Police Officer**

***Jerome Collins***

**FOR OUTSTANDING COMMUNITY SERVICE IN DISTRICT 2**

We present this certificate as our expression of appreciation  
 and as a record of our respect on this 4th day of February 2009.

*"The world cares very little about what a man or woman knows; it is what a man or woman is able to do that counts."* — Booker T. Washington



**Bernard Parker**

Wayne County Commissioner, District 2



## **EXHIBIT 5**

2008



2008



	Sept. 13	Sept. 20	Sept. 27	Oct. 4	*Oct. 11*	Oct. 18	Oct. 25	Nov. 1
	<b>TEAMS 1 - 2 - 3 vs 4 - 6 - 7</b>						<b>*PLAYOFFS*</b>	
	<b>DEVELOPMENT</b>						<b>ROUND 2</b>	
9:00					End Reg. Seas	*PLAYOFFS*	Consolation/Super Bowl	
10:00	1 vs 2 JV	2 vs 3 JV	4 vs 6 JV	3 vs 7 JV	1 vs 6 JV	3rd vs 6th V	2 vs 5 JV	
11:30	1 vs 2 V	4 vs 6 V	3 vs 5 V	2 vs 4 V	1 vs 6 V	6 vs 7 JV	1st vs winner 3rd vs 6th	2:00 PM
1:00	3 vs 4 JV	1 vs 7 JV	3 vs 1 JV	1 vs 5 JV	2 vs 4 JV	4th vs 5th V	4 vs 7 JV	3:30 PM
2:30	5 vs 6 V	1 vs 3 V	2 vs 6 V	1 vs 5 V	2 vs 3 V	3 vs 5 JV	2nd vs winner 4th vs 6th	5:00 PM
4:00	5 vs 6 JV	4 vs 5 JV	2 vs 7 JV	2 vs 6 JV	5 vs 7 JV	4 vs 1 JV	3 vs 6 JV	6:30 PM
5:30	3 vs 4 V	2 vs 5 V	1 vs 4 V	3 vs 6 V	4 vs 5 V			

1	<b>Flint Vikings</b>		2	<b>Flint Wildcats</b>	
3	<b>Flint Beasts</b>		4	<b>Flint Hawks</b>	
5	<b>H.W. Bulldogs - JV HAS A BYE ON 9-27-08</b>		6	<b>Flint Razorbacks</b>	
7	<b>Flint Eagles</b>				

Oct. 11

Development season ends. Players join their respective J.V. Teams. Seeds will be based on the following:  
 1. Win/Loss Record 2. Head to Head Match Up 3. Total Points - This Methodology includes "Regular Season Ties."

**NO PLAYOFFS FOR JV DIVISION! Top (4) four teams advance to Consolation/Super Bowl\* (Seeds-Same Rule Applies)**

**2009 FLINT AREA YOUTH FOOTBALL LEAGUE - SCHEDULE**  
(LOCATIONS AND TIMES ARE SUBJECT TO CHANGE)

**DEVELOPMENTAL TEAM - NUMBERS:**

BEAST - TM #1; EAGLES - TM #2; HAWKS - TM #3  
(COMBINED TEAMS): TEAM #4 - VIKINGS, WILDCATS, RAZORBACKS

**JR. VARSITY TEAM - NUMBERS:**

JV VIKINGS - TM #1; JV BEAST - TM #2; JV WILDCATS - TM #3  
JV BULLDOGS - TM #4; JV HAWKS - TM #5  
JV RAZORBACKS - TM #6; JV EAGLES - TM #7

**VARSITY TEAM - NUMBERS**

VAR VIKINGS - TM #1; VAR BEAST - TM #2 VAR RAZORBACKS - TM #3  
VAR BULLDOGS - TM #4 VAR HAWKS - TM #5

**SATURDAY, SEPTEMBER 19, 2009 AT NORTHWESTERN HS**

8:00 AM DEVELOPMENT TMS: TM 1 VS TM 4  
9:00 AM DEVELOPMENT TMS: TM 2 VS TM 3  
10:00 AM J. V. TMS: TM 2 VS TM 6  
11:30 AM J. V. TMS: TM 1 VS TM 7  
1:00 PM VAR TMS: TM 1 VS TM 3  
2:30 PM JV TMS: TM 3 VS TM 5  
4:00 PM VAR TMS: TM 2 VS TM 5

**BYE FOR 9/19/09: JV BULLDOGS & VAR BULLDOGS**

**SATURDAY, SEPTEMBER 26, 2009 AT NORTHWESTERN HS**

8:00 AM DEVELOPMENT TMS: TM 2 VS TM 4  
9:00 AM DEVELOPMENT TMS: TM 1 VS TM 3  
10:00 AM J. V. TMS: TM 1 VS TM 6  
11:30 AM J. V. TMS: TM 2 VS TM 5  
1:00 PM VAR TMS: TM 2 VS TM 3  
2:30 PM JV TMS: TM 3 VS TM 4  
4:00 PM VAR TMS: TM 4 VS TM 5

**BYE FOR 9/26/09: JV EAGLES & VAR VIKINGS**

**SATURDAY, OCTOBER 3, 2009 AT NORTHWESTERN HS**

8:00 AM DEVELOPMENT TMS: TM 1 VS TM 2  
9:00 AM DEVELOPMENT TMS: TM 3 VS TM 4  
10:00 AM J. V. TMS: TM 1 VS TM 5  
11:30 AM J. V. TMS: TM 2 VS TM 4  
1:00 PM VAR TMS: TM 1 VS TM 5  
2:30 PM JV TMS: TM 3 VS TM 7  
4:00 PM VAR TMS: TM 2 VS TM 4

**BYE FOR 10/3/09: JV & VAR RAZORBACKS**

**DEVELOPMENTAL TEAM - NUMBERS:**

BEAST - TM #1; EAGLES - TM #2; HAWKS - TM #3  
 (COMBINED TEAMS): VIKINGS, WILDCATS, RAZORBACKS - TM #4

**JR. VARSITY TEAM - NUMBERS:**

JV VIKINGS - TM #1; JV BEAST - TM #2; JV WILDCATS - TM #3  
 JV BULLDOGS - TM #4; JV HAWKS - TM #5  
 JV RAZORBACKS - TM #6; JV EAGLES - TM #7

**VARSITY TEAM - NUMBERS**

VAR VIKINGS - TM #1; VAR BEAST - TM #2 VAR RAZORBACKS - TM #3  
 VAR BULLDOGS - TM #4 VAR HAWKS - TM #5

**SATURDAY, OCTOBER 10, 2009 AT FLINT NORTHERN HS**

8:00 AM DEVELOPMENT TMS: TM 2 VS TM 3  
 9:00 AM DEVELOPMENT TMS: TM 1 VS TM 4  
 10:00 AM J. V. TMS: TM 6 VS TM 7  
 11:30 AM J. V. TMS: TM 1 VS (TM 4)  
 1:00 PM VAR TMS: TM 3 VS TM 5  
 2:30 PM JV TMS: TM 2 VS TM 3  
 4:00 PM VAR TMS: TM 1 VS (TM 4)

BYE FOR 10/10/09: JV HAWKS & VAR BEASTS

**SATURDAY, OCTOBER 17, 2009 AT FLINT NORTHERN HS**

8:00 AM DEVELOPMENT TMS: TM 1 VS TM 3  
 9:00 AM DEVELOPMENT TMS: TM 2 VS TM 4  
 10:00 AM J. V. TMS: TM 2 VS TM 7  
 11:30 AM J. V. TMS: (TM 4) VS TM 5  
 1:00 PM VAR TMS: TM 3 VS (TM 4)  
 2:30 PM JV TMS: TM 3 VS TM 6  
 4:00 PM VAR TMS: TM 1 VS TM 2

BYE FOR 10/17/09: JV VIKINGS & VAR HAWKS

**SATURDAY, OCTOBER 24, 2009 AT - ATWOOD STADIUM**

LAST DAY 8:00 AM DEVELOPMENT TMS: TM 1 VS TM 2  
 FOR DEV GMS 9:00 AM DEVELOPMENT TMS: TM 3 VS TM 4  
 10:00 AM J. V. TMS: TM 1 VS TM 3  
 11:30 AM J. V. TMS: (TM 4) VS TM 7  
 1:00 PM J.V. TMS: TM 5 VS TM 6  
 2:30 PM VARSITY TMS: 4TH PL VS 5TH PL

BYE FOR 10/24/09: JV BEAST

**TIMES & LOCATIONS SUBJECT TO CHANGE**

**TIE BREAKER: DETERMINED BY POINTS SCORED; THEN BY DEFENSIVE PTS. ALLOWED**

**OCTOBER 31, 2009 AT - ATWOOD STADIUM**

## **SEMI-FINALS!**

### **TIMES & TEAMS**

3:00 PM: JV 1ST PL VS 4TH PL

4:30 PM: JV 2ND PL VS 3RD PL

6:00 PM: VAR 1ST PL VS 4TH PL

7:30 PM: VAR 2ND PL VS 3RD PL

**CONGRATULATIONS TO ALL PLAYERS!**

**NOVEMBER 7, 2009 AT - ATWOOD STADIUM**

## **PLAYOFFS & SUPERBOWL!**

**PLEASE REFER TO SEMI-FINAL GAMES TO DETERMINE TEAMS PLAYING**

### **3:00 PM - JR. VARSITY:**

1ST & 4TH PLACE LOSERS WILL PLAY  
2ND & 3RD PLACE LOSERS

### **4:30 PM - VARSITY:**

1ST & 4TH PLACES LOSERS WILL PLAY  
2ND & 3RD PLACE LOSERS

### **6:00 PM - JR. VARSITY CHAMPIONSHIP!**

1ST & 4TH PLACE WINNERS WILL PLAY  
2ND & 3RD PLACE WINNER

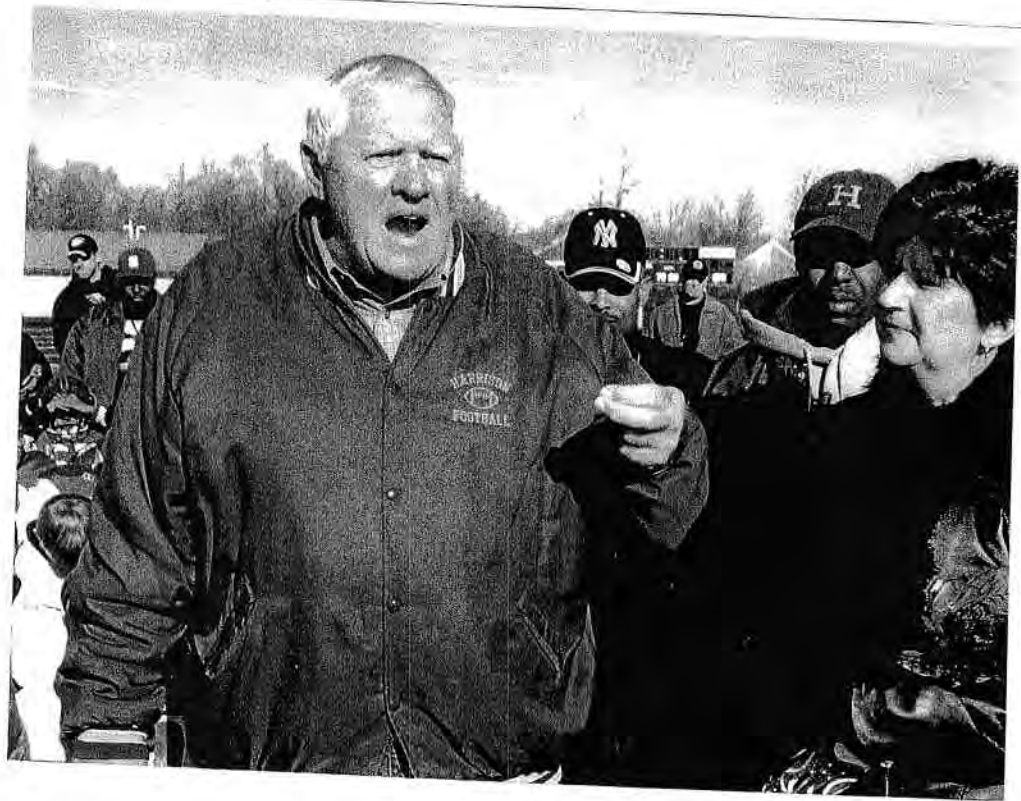
### **7:30 PM - VARSITY CHAMPIONSHIP!**

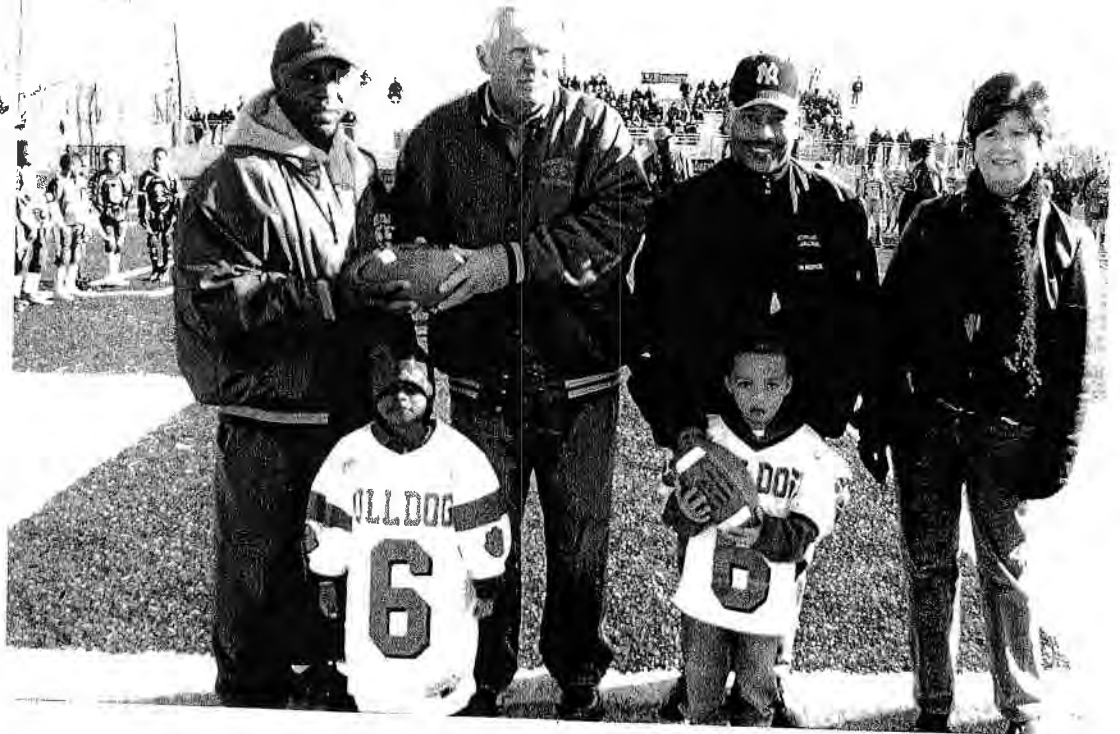
1ST & 4TH PLACE WINNERS WILL PLAY  
2ND & 3RD PLACE WINNER

**CONGRATULATIONS TO ALL PLAYERS!**

## **EXHIBIT 6**









## **EXHIBIT 7**

# ONLINE CLERY ACT TRAINING

AVAILABLE NOW

## REGISTER TODAY!


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## Acquitted Officer Files for Reinstatement

Jerome Collins was recently acquitted of charges that he was paid as a cop while working as a hospital security guard. He is ficer.



By CS Staff · December 14, 2011

DETROIT — A police officer who was recently acquitted of charges that he was paid as a cop while working as a hospital security guard is seeking reinstatement and back pay.

Jerome Collins was accused of reporting he was on the clock as a Detroit police officer while he was working as a security guard at St John Riverview Hospital from 2007 to 2009, *The Detroit News* reports. Collins' attorney Gerald Evelyn said police records failed to properly track the irregular shifts worked by Collins.

Back pay will likely amount to more than Collins was accused of taking.

Read the full story. (<http://www.detroitnews.com/article/20111213/METRO/112130423/1361/Detroit-cop-cleared-of-wrongdoing-files-for-reinstatement>)

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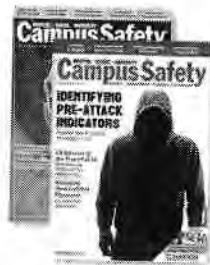


A  
Smarter

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Consultant Jim  
Grayson discusses  
ways to implement  
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# Detroit Police Officer Charged

*Posted 7 years ago.*

Boom Columbus

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Jerome Collins, 49, was charged in Wayne County court yesterday after allegedly working as a security guard at St. John's Riverview Hospital while on duty as a Detroit police officer.

Collins, who did double duty from November 2007 to November 2009, received over \$15,000 in wages from the City of Detroit for work not performed. He is currently suspended without pay.

If convicted, he could face up to five years each for Larceny by False Pretenses and Misconduct in Office, both felonies.

His arraignment was scheduled for today at 1:30 p.m.

## Also On The Michigan Chronicle:

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## **EXHIBIT 8**

11/30/2010 13:40 3135962440

INVS

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NOV-30-2010(TUE) 13:23

P.007/008

M. Bully-Cummings  
Chief of Police

D.P.D. 558 (rev. 9/97)

## INTER-OFFICE MEMORANDUM EASTERN DISTRICT

Date

November 28, 2010

TO: Commanding Officer, Eastern District (Through Channels)

SUBJECT: EASTERN DISTRICT SUMMER ACTIVITIES, 2008

FROM: Sergeant Mattie Lewis, S-66

### SUMMER ACTIVITIES IN THE EASTERN DISTRICT

**Shoe Drive:** The Community Relations Officers of the Eastern District gave away gym shoes to needy children and adults during the month of May 2008. Over two hundred new shoes were donated to the Eastern District.

**Beautification Day:** On June 14, 2008, the Eastern District will involve the citizens of the District in cleaning up the front of the District. This will include citizen planting flowers, cut grass and trim hedges. The District will also have an ice cream social, hot dogs and chips for the public.

**Blood Drive:** On Thursday, June 18, 2008, at approximately 7:00 A.M., the Eastern District will participate in a blood drive sponsored by the American Red Cross. The location for the blood drive will be held at the Eastern District in the Conference room. Our set goal is to have as many participants as possible.

**Community Crime Walk:** On June 28, 2008, the Eastern District will sponsor its 3<sup>rd</sup> Annual Community Crime Walk participants from the community will participate in the walk.

**Click it the Cricket:** Proper use of child restraint seats; **THIS A TRAINING INITIATIVE** for citizens. The location for this initiative will be at Mike's Fresh Market, 14383 Gratiot. The purpose of this event was to show and train parent on how to properly secure their child restraints in a vehicle. Officer Rios inspected vehicles with child restraints already in them to ensure they were properly secure. The scheduled date is July 12, 2008.

**Citizen Safety Initiative;** this will be a program to show citizens how to protect themselves and their property and to be aware of their surrounding, this will be a seminar held at the Eastern District. The scheduled date is July 19, 2008.

**Bicycle helmet safety;** Proper use of the bicycle helmets and the proper way to wear and adjusting the helmet to fit the head. The scheduled date for this Initiative is August 1, 2008.

**Youth Initiative:** The Eastern District League is a basketball team and foot ball team in the age bracket of thirteen years of age and under. In 2007 this age group won the 2007 basketball and foot ball championship. These teams consist of youth in the Eastern District. This is a year round initiative.

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NOV-30-2010(TUE) 13:23

P. 006/008

Commanding Officer, Eastern District (T.C.)

November 29,

2010  
Page 2

Subject: **EASTERN DISTRICT COMMUNITY RELATIONS**

From: **Sergeant Mattie Lewis, S-66**

**Senior Citizen Day**, officer from Community Relations will have a cook out for the seniors who resides in the district. Activities will include bingo, poker, and others activities.

**Youth**, will include a bicycle rodeo, bike safety, helmet give a way and the issuance of bicycle license as well as a bicycle inspection.

**Boat Race**, 25 students from Fleming Elementary School will be taken to the boat race

**NASCAR Race**, 15 students from Duke Ellington Academy will be taken to the race

**Community Relations Activities**

Organizing more block clubs  
Security Surveys  
Etching personal items  
Gun locks give-a-way

**MATTIE LEWIS**  
Sergeant, S-66  
Eastern District

11/30/2010 13:40 3135962440

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NOV-30-2010(TUE) 13:22

P. 004/008

S.M. Bully-Cummings  
Chief of Police

D.P.D. 588 (rev. 5/97)

**INTER-OFFICE MEMORANDUM  
EASTERN DISTRICT**

Date

November 29, 2010

o: Commanding Officer, Eastern District (Through Channels)  
ubject: **EASTERN DISTRICT INITATIVES**  
rom: Sergeant Mattie Lewis, S-66

**INITATIVES IN THE EASTERN DISTRICT**

Starting the month of April until further notice, the Detroit Police Reserves Officer will patrol the public parks in the Eastern District.

**Click it the Cricket:** Proper use of child restraint seats; **THIS A TRAINING INITIATIVE.** The location for this initiative will at Mike's Fresh Market, 14383 Gratiot. The purpose of this event was to show and train parent on how to properly secure their child restraints in a vehicle. Officer Rios inspected vehicles with child restraints already in them to ensure they were properly secure. The scheduled date is July 12, 2008

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**Community Crime Walk:** On June 28, 2008, the Eastern District will sponsor it's 2<sup>nd</sup> Annual Community Crime Walk with over 150 participants participated in the walk.

DEFENDANT'S  
EXHIBIT

11/30/2010 13:40 3135962440

INVS

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NOV-30-2010(TUE) 13:23

P. 005/008

**Chief of Police**  
**D.P.D. 008 (rev. 8/97)**

# INTER-OFFICE MEMORANDUM EASTERN DISTRICT

Date  
November 29, 2010

To: Commanding Officer, Eastern District (Through Channels)

Subject: EASTERN DISTRICT INITIATIVES, 2008

From: Sergeant Mattie Lewis, S-66

## Community Relations Activities, Projects and Programs for Senior Citizens and Youth

**Beautification Day:** On June 14, 2008, the Eastern District will involve the citizens of the District in cleaning up the front of the District. This will include citizen planting flowers, cut grass and trim hedges. The District will also have an ice cream social, hot dogs and chips for the public.

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NOV-30-2010(10E) 13:23

P. 008/008

TO: Commanding Officer, Eastern District (T.C.)  
SUBJECT: INITIATIVES IN THE EASTERN DISTRICT  
FROM: Sergeant Mattie Lewis, S-66

November 29,  
2010  
Page 2

**MATTIE LEWIS**  
Sergeant, S-66  
Eastern District



11/30/2010 13:40 313596240

INVS

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NOV-30-2010(TUE) 13:22

P. 003/008

Commanding Officer, Eastern District (T.C.)  
Subject: INITATIVES IN THE EASTERN DISTRICT  
From: Sergeant Mattie Lewis, S-66

November 29,  
2010  
Page 2

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(Denned pt 4)